

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,)
)
)
v.)
)
)
BONNIE GARDNER,) Criminal No. 09-180
)
)
Defendant.)

MOTION TO APPROVE COPYING EXPENSE

AND NOW comes Defendant, Bonnie Gardner, by and through her attorney, Martin A. Dietz, Esquire, and respectfully moves this Court to grant the within motion on the following basis:

1. Defendant, Bonnie Gardner (hereinafter “Ms. Gardner”) is charged with conspiracy, mail fraud and wire fraud. She is scheduled to select a jury on May 8, 2013 and begin a jury trial on May 13, 2013.

2. During the pretrial proceedings in this case, the government produced thousands of pages of discovery materials as well as many witness statements. The government has produced an exhibit list in this case containing over 2700 exhibits, most of which are multiple pages. There are hundreds of witness statements as well. All of the materials were produced on data CDs or by email. In order to properly prepare for trial and to have the exhibits and statements available at trial, it is necessary to have paper copies made of the discovery materials.

3. At this juncture, it is not possible to predict the exact cost of copying the materials. However, under the Criminal Justice Act, when the cost of services of requested services exceeds \$800.00, approval of a judicial officer is required in order for the payment for the service to be approved. 18 U.S.C. §3006A(e)(2). Based on the intensive paper nature of this case, it is

possible that the copying expense could exceed the \$800 threshold.

4. The requested copying expense is reasonable and necessary in this case.

5. Should the Court grant the instant motion, undersigned counsel will advance the cost of the expense and submit it on his final CJA voucher.

WHEREFORE, it is respectfully requested that this Court sign the attached order to permit undersigned counsel to submit this expense on his CJA voucher.

Respectfully submitted,

s/ Martin A. Dietz.
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